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6	Attorneys for Defendants	OFFICE	
7	CITY OF CONCORD, OFFICER O'BRIEN, DONNELLY, OFFICER GOLVINEAUX, SI		
8	ELSBERRY		
9	UNITED STAT	ES DIST	
10	NORTHERN DISTRICT (
11			
12	ALANY JEAN HELMANTOLER, T.H.,	Cas	
13	K.H., and M.H., minors, through their guardian ad litem ALANY JEAN	ST	
14	HELMANTOLER,	OR MA	
15	Plaintiffs,	Tria	
16	VS.	Tria	
17	CITY OF CONCORD, OFFICER O'BRIEN, OFFICER DONNELLY,	Act	
18	OFFICER GOLVINEAUX, SERGEANT ELSBERRY, and DOES 1-10,		
19	Defendants.		
20			
21	IT IS HEREBY STIPULATED AND	AGREE	
	4 14 4 4 1 6 1	C 11	

2 3 4 5	NOAH G. BLECHMAN (State Bar No. 1971 LAURA A. COX (State Bar No. 296147) MCNAMARA, NEY, BEATTY, SLATTERY, BORGES & AMBACHER LLP 1211 Newell Avenue Walnut Creek, CA 94596 Telephone: (925) 939-5330 Facsimile: (925) 939-0203	67)			
6 7 8	Attorneys for Defendants CITY OF CONCORD, OFFICER O'BRIEN, OFFICER DONNELLY, OFFICER GOLVINEAUX, SERGEANT ELSBERRY				
9	UNITED STATES DISTRICT COURT				
10	NORTHERN DISTRICT OF CALIFORNIA				
11					
12 13 14	ALANY JEAN HELMANTOLER, T.H., K.H., and M.H., minors, through their guardian ad litem ALANY JEAN HELMANTOLER,	Case No. CV 14-02855 VC STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT DEADLINES			
15 16 17	Plaintiffs, vs. CITY OF CONCORD, OFFICER O'BRIEN, OFFICER DONNELLY,	Trial Judge: Hon. Vince Chhabria Trial Date: June 29, 2015 Action Filed: June 20, 2014			
18	OFFICER GOLVINEAUX, SERGEANT ELSBERRY, and DOES 1-10,	redon ried. Julie 20, 2014			
19	Defendants.				
20					
21	IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action				
22	through their respective counsel of record, as	follows:			
23	WHEREAS this civil rights action is	currently pending in the above entitled Court and has			
24	case management deadlines as set forth in the	e Court's Minute Entry of September 24, 2014 (ECF			
25	Doc. 24), dates set at the Case Management (Conference of September 23, 2014.			
26	WHEREAS the parties performed some key discovery prior to mediation and then				
27	recently attended mediation on January 15, 2015, which was not successful. Other discovery now				
28	needs to be completed and there is insufficient time for the parties to do so prior to the current				

STIPULATION AND ORDER CONTINUING CASE MANAGEMENT DEADLINES - C14-02855 VC

deadline of February 13, 2015, for expert disclosure and March 6, 2015, for the fact discovery cut-off. In addition, the parties want to move back expert disclosure and expert discovery deadlines in this case.

WHEREAS the parties have met and conferred and have agreed to the following modifications to the current deadlines in this case as follows:

Description	Current Deadline	New Deadline
Expert Disclosure	February 13, 2015	March 6, 2015
Rebuttal Expert Disclosure	February 23, 2015	March 16, 2015
Fact Discovery Cut Off	March 6, 2015	March 20, 2015
Expert Discovery Cut Off	March 20, 2015	April 24, 2015

WHEREAS none of these new proposed dates will modify the deadline to file dispositive motions (April 2, 2015), the Final Pretrial Conference (June 16, 2015) or the Trial Date (June 29, 2015) set in this matter.

WHEREAS good cause exists to reset these case management deadlines per the parties' agreement.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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1	Dated: January 27, 2015 LAW OFFICES OF JOHN F. MARTIN		FICES OF JOHN F. MARTIN		
2		.	(24 - 27)		
3			By: /s/ Marta R. Vanegas John F. Martin		
4			Marta R. Vanegas Attorneys for Plaintiffs		
5		ALA M.F	ANY JEAN HELMANTOLER, T.H., K.H., and I., minors, through their guardian ad litem ALANY N HELMANTOLER		
6	Datad: January 27				
7	Dated: January 27		MCNAMARA, NEY, BEATTY, SLATTERY, BORGES & AMBACHER LLP		
8		By:/	s/ Noah G. Blechman		
9		Jam Noa	es V. Fitzgerald, III h G. Blechman		
10	Laura A. Cox				
		CIT	Y OF CONCORD, OFFICER O'BRIEN, OFFICER		
11		SEF	NNELLY, OFFICÉR GOLVINEAUX, RGEANT ELSBERRY		
12		<u>C</u>	<u>DRDER</u>		
13	PURSUANT TO STIPULATION, THE PARTIES NEW PROPOSED DEADLINES				
14	ARE AS FOLLO	WS:			
15		Description	New Deadline		
16		Expert Disclosure	March 6, 2015		
17		Rebuttal Expert Disclosu	re March 16, 2015		
18		Fact Discovery Cut Off	March 20, 2015		
19		Expert Discovery Cut Of	f April 24, 2015		
20	ALL OTHER RELEVANT DEADLINES SHALL REMAIN IN EFFECT.				
	ALL OTH	ER RELEVANT DEADL	INES SHALL REMAIN IN EFFECT.		
21	ALL OTH IT IS SO ORDER		INES SHALL REMAIN IN EFFECT.		
21			INES SHALL REMAIN IN EFFECT.		
21 22		RED	INES SHALL REMAIN IN EFFECT.		
21 22 23	IT IS SO ORDER	2, 2015 By:			
21222324	IT IS SO ORDER	2, 2015 By:	INES SHALL REMAIN IN EFFECT. Hon. Vince Chhabria J.S. District Court Judge		
21 22 23	IT IS SO ORDER	2, 2015 By:	Hon. Vince Chhabria		
21222324	IT IS SO ORDER	2, 2015 By:	Hon. Vince Chhabria		
2122232425	IT IS SO ORDER	2, 2015 By:	Hon. Vince Chhabria		
212223242526	IT IS SO ORDER	2, 2015 By:	Hon. Vince Chhabria		

Case 4:14-cv-02855-HSG Document 29 Filed 02/02/15 Page 3 of 3